

3
1 Katherine Christensen
2 Real Party in Interest Under Injury
3 c/o 1134 West Grand Caymen Drive
4 Gilbert, Arizona 85233
5 (480) 813-3885
6 PRO SE

FILED
2009 DEC 15 PM 2:37
CLERK
U.S. BANKRUPTCY
DISTRICT OF ARIZONA

7
8 **UNITED STATES BANKRUPTCY COURT**

9
10 **DISTRICT OF ARIZONA**

11
12 **PHOENIX DIVISION**

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14
15 In re:) **CASE NO. 09-21818-RTB**
16) **ADVERSARY 09-ap-01369-RTB**
17 Katherine Christensen)
18 Plaintiff, Real Party in Interest) **CHAPTER 7**
19 V.)
20 JP MORGAN CHASE & CO.) **MOTION FOR DEFAULT AND**
21 its successors and/or assigns) **DEFAULT JUDGMENT**
22 Defendant)
23) **Assigned to Hon. Redfield T. Baum**
24

25
26 Plaintiff Katherine Christensen, respectfully submits this MOTION FOR
27
28 **DEFAULT AND DEFAULT JUDGMENT** against JP MORGAN CHASE & CO.
29
30 Defendant as authorized by Federal Rule of Civil Procedure 55.
31

32
33 **STATEMENT OF FACTS**

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35
36 1. Defendant has never responded to any of the lawful and required Qualified
37
38 Written Requests for Debt Validation authorized by Title 12 and Title 15.
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40 2. On November 4, 2009 at 4:17pm Plaintiff served Defendants a Motion for
41

1 Commencement of Adversarial Proceeding with Summons in an Adversarial
2
3 Proceeding by USPS Certified Mail # 7009 0080 0002 0454 2135. USPS Track
4
5 and Confirm shows that it was received by Defendant on November 9, 2009 at
6
7 12:56 pm.
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9 3. Pursuant to Federal Rules of Bankruptcy Defendant had 30 days from the
10
11 date of issuance of the summons to respond.
12

13 4. Defendant has not responded as per the date of this Motion, which is well
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15 beyond the 30 days allowed and therefore defaulted.
16

17 18 CONCLUSION

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21 1. Defendant did not file an answer within 30 days from the date of the
22
23 issuance of the summons.
24

25 2. Real Party in Interest meets the procedural requirements for obtaining both
26
27 an entry of default and default judgment.
28

29 3. Because Defendant did not file a responsive pleading or otherwise defend
30
31 the suit, defendants admit they have no true and valid records to prove they had
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33 standing to bring this action.
34

35 **Wherefore Real Party in interest prays for judgment as follows:**
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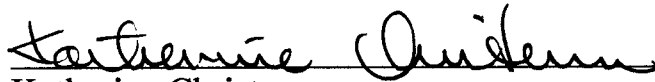
37 1. That the Court enter a default judgment in favor of Plaintiff.
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39 2. As time is of the essence, that the Court order Defendant to immediately
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1 restore ownership and return clear title of subject Property back to Plaintiff free
2
3 and clear.
4

5 3. That the Court grant relief to the Plaintiff for all violations by Defendant
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7 its successors and assignees as provided by law; all costs, applicable interest, and
8
9 other relief as this court deems just and necessary.
10

11
12 DATED: December 15, 2009

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14 

15 Katherine Christensen

16 Plaintiff, Real Party in Interest